



WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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ARIANE ROWLAND, and JAMIE  
SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC., WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA, and BRUCE  
MAPLEY SR.,

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC.'S RESPONSES  
TO PLAINTIFFS' SECOND SET OF  
JURISDICTIONAL DISCOVERY**

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TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), by and through its attorneys, and responds to Plaintiffs' Second Set of Jurisdictional Discovery as follows:

Defendant Watch Tower Bible and Tract Society of New York, Inc.'s Responses to  
Plaintiffs' Second Set of Jurisdictional Discovery - 2

### **GENERAL OBJECTION**

In the Court's Orders Re Scope of Jurisdictional Discovery (Doc. 47 in the *Caekaert* matter<sup>1</sup>; Doc. 37 in the *Rowland* matter<sup>2</sup>), the Court concluded "[d]iscovery regarding WTPA's corporate relationship with WTNY from 1973 to 1992 is...appropriate." See Doc. 47 (in the *Caekaert* matter), p. 5; Doc. 37 (in the *Rowland* matter), p. 5. Accordingly, any discovery requests seeking information before 1973 or after 1992 are improper and outside the scope of Court-ordered limitations on jurisdictional discovery.

### **INTERROGATORIES**

**INTERROGATORY NO. 6:** Identify each person who worked in the church's Service Department between 1960 and 1990.

**ANSWER:** Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague as to the term "church's Service Department." Further, this request is overbroad, is not reasonably calculated to lead to the discovery of admissible information, is not proportional to the needs of the case, and infringes on the privacy rights of third parties.

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<sup>1</sup> References to the *Caekaert* matter means Cause No. CV 20-52-BLG-SPW

<sup>2</sup> References to the *Rowland* matter means Cause No. CV 20-59-BLG-SPW.

**ANSWER:** Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Circuit and District Overseers may have provided Bible-based research and guidance to elders in Montana during the relevant time period on an as-needed basis, but the exact nature and extent of any such assistance is unknown based on the information in WTNY's possession, custody, or control.

**INTERROGATORY NO. 21:** Please identify all your legal and "doing business as" names from 1950 to 1995, including the date(s) each name was used.

**ANSWER:** Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Watchtower Bible and Tract Society of New York, Inc.

**INTERROGATORY NO. 22:** Please identify three people that are still alive who have the most knowledge of WTNY's activities within the United States during the period 1960 to 1990.

**ANSWER:** Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Thomas Jefferson, Jr. (minister), Mario Moreno (attorney), and Alan Browning (accounting).